

REMARKS

I. INTRODUCTION

Claims 1-43 are pending in the present application. In view of the following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

II. THE 35 U.S.C. § 103 REJECTIONS SHOULD BE WITHDRAWN

Claims 1, 2, 4-11, 13-15, 17-24, 26-28, 30-40, 42 and 43 stand rejected under 35 U.S.C. 103 as being obvious over U.S. Patent No. 6,148,203 to Renko et al. (hereinafter "Renko") in view of U.S. Patent No. 6,292,666 to Siddiqui et al. (hereinafter "Siddiqui"). In addition, claims 3, 12, 16, 25, 29, 38 and 41 stand rejected under 35 U.S.C. 103 (a) as being unpatentable over Renko and Siddiqui in view of U.S. Patent No. 6,574, 266 to Haartsen (hereinafter "Haartsen").

In order for a claim to be rejected for obviousness under 35 U.S.C. § 103, not only must the prior art teach or suggest each element of the claim, the prior art must also suggest combining the elements in the manner contemplated by the claim. See Northern Telecom, Inc. v. Datapoint Corp., 908 F.2d 931, 934 (Fed. Cir.), cert. denied 111 S.Ct. 296 (1990); In re Bond, 910 F.2d 831, 834 (Fed. Cir. 1990).

Applicants' invention, as recited in independent claim 1, relates to a universal remote terminal for use in wireless local area networks in a plurality of countries which includes a circuitry configured to:

scan to find a communication channel carrying a
communication for a nearby wireless local area network;
*send a probe communications message on the
communication channel in response to finding the communications
channel when scanning;*
*receive a reply communications message comprising
country-specific information from a transmitter in a particular*

country that was sent in reply to the probe communications message; and

adapt to that country's communications specifications to suitably operate in wireless local area networks in that country in response to receiving the country-specific information.

(Emphasis Added)

Independent claims 14, 27 and 40 include similar limitations.

Renko relates to a method for registering a communication device for a communication service. In particular, Renko describes a method for reducing “the time it takes the communication device to find an appropriate carrier and register.” (*See Renko*, col. 2, lines 5-6). The device stores in its memory a list of worldwide frequencies used for wireless communications. (*See id.*, col. 2, lines 25- 52). These frequencies are organized by bandmaps which are the comprehensive lists of all frequencies used in a particular region of the world. (*See id.*, col. 4, lines 2-6). One specific bandmap that the device maintains is a learned bandmap which is a dynamic memory list that stores the most recently used frequencies. (*See id.*, col. 2, lines 34- 36).

Upon powering up of the device, it initiates scanning of the learned bandmap to find a primary control channel (“PCCH”) (*See id.*, col. 4, lines 26-27). If no the PCCH is found, the device scans the present regional bandmap. (*See id.*, col. 4, lines 31- 34). In particular, all of “the frequencies listed in the present regional map would be scanned.” (*See id.*, col. 2, lines 63). Renko acknowledges that the inability to locate the PCCH might be due to a weak signal. (*See id.*, col. 3, lines 7-10). Thus, to reduce the time to find the PCCH, Renko suggests to alternate the scanning between “the last used region map, and successive sections of the complete world wide bandmap.” (*See id.*, Col. 2, lines 19-21). Once the PCCH is found, the device obtains information about a broadcast control channel (“BCCH”) from the PCCH signal. (*See id.*, col. 4, lines 60-61). Then, the device switches to listen to the BCCH in order to obtain a public land mobile network (“PLMN”) code. (*See id.*, col. 2, lines 21-24; col. 3, lines 56-62; col. 4, lines 50-55). In other words, the BCCH “will be read (216) to obtain the PLMN code...” (*See id.*, col. 4,

lines 50-55). The PLMN code includes a mobile country code (“MCC”) and a mobile network code (“MNC”). (See id., col. 3, lines 62-63).

Siddiqui discloses a telecommunications system which determines and relays to a mobile station (“MS”), the identity of the current country that the MS is located in, along with the distance to the nearest country border. (See Siddiqui, Abstract). In particular, Siddiqui describes a method to update the location of the MS, where the update is initiated based on roaming of the MS within and between satellite cells. (See id., col. 4, lines 32-34). Specifically, “[a]s the MS *roams* into a new satellite cell 250*b*, the MS *receives* signals on the ECCH [sic], and compares the transmitted cell identification 255*b* with the cell identification 255*a* stored in the memory 27.” (Id.) (Emphasis Added). After the MS performs the comparison of cell identifications, it can initiate the location update procedure. (See id., col. 4, lines 35-49).

The Examiner in rejecting claims 1, 14 and 27 states that Renko discloses all elements of the claimed invention, except that Renko fails to disclose “wherein the country-specific information is received in a reply message sent in response to the remote terminal sending a probe message.” (See 3/1/04 Office Action, p.2). The Examiner attempts to cure the deficiencies of Renko by stating that Siddiqui “discloses a mobile station that receives country-specific information in response to sending a location update message.” (See id.).

Applicants respectfully submit that neither Renko nor Siddiqui illustrate or describe, nor do they suggest, a device which includes a circuit which is configured to *send a probe communications message on the communication channel in response to finding the communications channel when scanning*, as recited in independent claims 1, 14, 27 and 40. As the Examiner has noted, Renko fails to disclose that the circuitry sends a probe communications message on the communication channel in response to finding the communications channel when scanning. Siddiqui does not cure this deficiency. Initially, it is noted that Siddiqui does not disclose that the MS is capable of performing a scanning function. As described, the MS will only perform the location update in response to roaming and receiving/comparing location

information from a satellite beam. Therefore, the MS does not initiate communication with the satellite. On the other hand, the Applicant's circuitry sends a probe message in response to finding a communications channel when scanning, which the remote terminal initiates. Furthermore, Siddiqui does not disclose sending a probe message in response to finding a communication channel when scanning, as recited in claim 1. In Siddiqui, the MS sends a location update request if the cell identification received from the satellite beam is different from the cell identification stored on the memory of the MS. A comparison of cell identifications (requiring evaluating two sets of data) is not a function similar to scanning (only requires finding a communications channel). Therefore, one of ordinary skill in the art would not have to modify Siddiqui to include a scanning function and to send a probe communications message on the communications channel in response to finding the communications channel when scanning. Thus, it is respectfully submitted that neither Renko nor Siddiqui include any showing or suggestion, alone or in combination, of a device that includes a circuit configured to *send a probe communications message on the communications channel in response to finding the communications channel when scanning*. It is therefore respectfully submitted that claims 1, 14, 27 and 40 are not anticipated by or obvious over Renko in view of Siddiqui, and these rejections should be withdrawn for at least the reasons stated above.

Claims 2-13, 15-27, 28-39 and 41-43 depend from corresponding independent claims 1, 14, 27 and 40, therefore, the arguments presented above in connection with claim 1 apply equally to these claims. Thus, for at least the reasons discussed above, neither Renko, Haartsen nor Siddiqui, alone or in combination, render obvious any of Claims 2-13, 15-27, 28-39 and 41-43. Therefore, Applicants respectfully request that the § 103 rejections of claim 1-43 should be withdrawn.

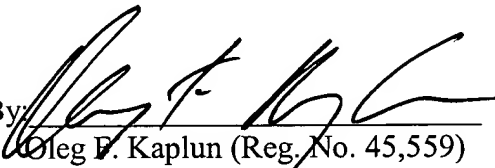
III. CONCLUSION

In light of the foregoing, Applicants respectfully submit that all of the pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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By



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